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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ARTURO J.
GONZALEZ IN SUPPORT OF
DEFENDANTS' UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S OPPOSITION TO
WAYMO'S MOTION TO COMPEL
STROZ-RELATED DISCOVERY**

Trial Date: December 4, 2017

1 I, Arturo J. Gonzalez, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Morrison &
3 Foerster LLP, counsel of record for Defendants Uber Technologies, Inc. and Ottomotto LLC in
4 this action. I am admitted to practice before this Court. I submit this declaration in support of
5 Defendants' Opposition to Waymo's Motion to Compel Stroz-Related Discovery. I have
6 personal knowledge of the facts stated herein and, if called as a witness, I could and would testify
7 competently as to these facts.

8 2. After Angela Padilla sent her April 20, 2017 letter requesting access to Anthony
9 Levandowski's personal computers, Neel Chatterjee of Goodwin Procter told me that
10 Mr. Levandowski would not turn over the personal computers for searching due to his invocation
11 of the Fifth Amendment. On April 22, 2017, as an alternative, I asked Mr. Chatterjee to agree to
12 run search terms on the personal computers and to provide the results. Morrison & Foerster
13 provided Goodwin Procter with the 14,000-plus filenames referenced in Waymo's preliminary
14 injunction papers, the hash values for those 14,000-plus files, and Uber's and Waymo's search
15 terms for those files for the searches. Mr. Chatterjee did not provide me or anyone else at
16 Morrison & Foerster with the details of the searching that was conducted on Mr. Levandowski's
17 personal computers, including who ran the searches, what searches were actually run, or how the
18 searching was done.

19 3. On May 17, 2017, Goodwin Procter transmitted the results of the searches of
20 Mr. Levandowski's computers to Morrison & Foerster.

21 I declare until penalty of perjury that the foregoing is true and correct. Executed this
22 17th day of October, 2017, in San Francisco, California.

23
24 /s/Arturo J. González

Arturo J. González